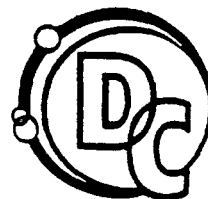


DABCO chemical, inc.



2215 SUTTON ROAD, YORK, PA. 17403

(717) 741-1345

Manufacturer & Distributor of Specialty Chemicals

November 21, 1995

*This letter sent
11-21-95 Certified
to Mary Rugala, Esq.*

Mary E. Rugala, Esq.
Assistant Regional Counsel
United States Environmental Protection Agency
Region III, 841 Chestnut Building
Philadelphia, PA 19107

Dear Attorney Rugala:

I am applying for a "de micromis" settlement as a fourth party defendant at the Keystone Sanitation site as we meet all the requirements to be eligible for such settlement.

We do not manufacture, store, ship or dispose of any hazardous substances. We blend sodium tripolyphosphates, sodium hexametaphosphate and sodium silicate for sale to municipal water companies to reduce lead and copper in drinking water.

These products are approved by U. S. EPA to be used in drinking water and more than one million people drink these chemicals every day. Copies of EPA approvals and Underwriters Labs approval as to the safety of these products are enclosed.

Also enclosed is a copy of a memo I sent to Mr. Michael Toule dated July 6, 1988 stating that I do not deal in hazardous substances. After receiving a threatening letter from Kirkpatrick and Lockhart dated January 16, 1991, I talked with Deborah Drewsberry on January 18, 1991. She stated that I am not on EPA's list as a PRP and should ignore any future letters from this firm.

We put empty bags of these above chemicals only in a dumpster at 304 W. King Street, East Berlin, Pennsylvania. They pick up once a week and the contract is let by the East Berlin Borough. I have no choice but to pay a monthly bill to whoever gets the contract. I do not dispute that our empty bags went to the Keystone site, but they are not hazardous. Our volume is estimated at 1786 cubic yards.

In response to the November 13, 1995 letter to the Honorable Judge Rambo by the U.S. Department of Justice, I certify that I am President of DABCO Chemical, Inc. and subject to the penalties of perjury.

ARDC001

Mary E. Rugala, Esq.

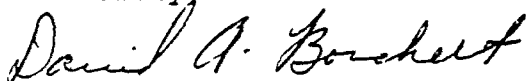
November 21, 1995

-Page 2-

By copy to Attorney Schwab, this letter should satisfy all discovery and interrogatories.

I would appreciate a settlement answer before December 8, 1995 as I have spent too much money and time already.

Sincerely,



David A. Borchelt
President

se

copy to: Susan E. Schwab, Esq.
Rhoads & Sinon
One South Market Square
Harrisburg, PA 17108-1146

Congressman Bill Goodling



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

In Reply Refer
To: 3WA30

January 30, 1978

David A. Brochelt, President
Dabco Chemical Co.
2215 Sutton Road
York, PA 17407

SUBJECT: DAB-Coat No. 22

Dear Mr. Brochelt:

Based upon the information submitted, Dab-Coat #22 is acceptable for potable water application when used within the stated rates (4-8ppm maximum). Acceptance of this product does not constitute an endorsement by the Agency.

Very truly yours,

W. M. Blankenship
W. M. Blankenship P.E.
Technical Advisor
Water Supply Branch

cc: Dr. J. Cotruvo, OWS, WH-550
Mr. Lowell Van den Berg, MERL, Cincinnati
Dept. of Health, State of: DE, VA, W.VA, MD, DC, PA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 14 1987

Mr. David A. Borchelt
Dabco Chemical
2215 Sutton Road
York, PA 17403

OFFICE OF
WATER

RE: File Number 04-005.00-AEB-87

Dear Mr. Borchelt:

Based on the information submitted, the corrosion control agent listed below is acceptable for use in potable water systems when used within the stated rates.

<u>Product</u>	<u>Maximum Recommended Concentration</u>
DABCOAT No. 22 (Liquid)	10.0 mg/l

We would not anticipate any adverse health effects resulting from use of this product when used at or below the requested feed rates, assuming the product continues to meet the supplied specifications and the specifications of the Water Chemicals Codex, 1982 edition (National Academy Press); and the Water Chemicals Codex: Supplementary Recommendations for Direct Additives, 1984 edition (National Technical Information Service).

This opinion is granted on an interim basis only. EPA is in the process of establishing an alternative advisory program for drinking water additives as described in the Federal Register, Vol. 49, No. 97, 21003-8, May 17, 1984. When the new program is in place, all existing advisories may be periodically reviewed.

Our opinion concerning the safety of the product does not constitute an endorsement, nor does it relate to product effectiveness for the intended use. If this letter is to be used in any way, we require that it be quoted in its entirety.

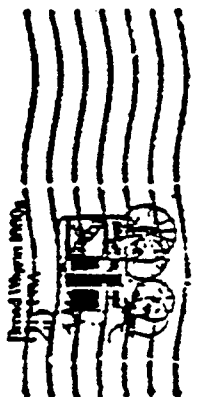
Sincerely,


Arthur H. Perler, Chief
Science and Technology Branch

ARDC004

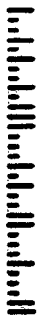
DABCO CHEMICAL, INC.
FACTURER & DISTRIBUTOR OF SPECIALTY CHEMICALS
2215 SUTTON RD. - YORK, PA 17403
(717) 741-1345

RECEIVED JUL 08 1988



Mr. Michael Towle
U.S. EPA, Region III
PA CERCLA Remedial Enforcement Section (3HW12)
P.O. Box 3409
Reston, VA 22091

AR200257



DABCO CHEMICAL, INC.
2215 Sutton Rd.
YORK, PENNSYLVANIA 17403

MEMO

RECEIVED JUL 08 1988

(717) 741-1345

TO Mr. Michael Towle
EPA

DATE	July 6, 1988
SUBJECT	3 HW 12

Dear Mr. Towle:

We do not manufacture, store or ship any hazardous substances. Keystone Sanitation picks up empty bags of calcium hexametaphosphate, sodium tri-phosphate and sodium metasilicate in their dumpsters where these products go into potable water treatment and are approved by the EPA.

☐ PLEASE REPLY ☐ NO REPLY NECESSARY

DAVID A. BORCHELT - PRES
David A. Borchelt



Underwriters Laboratories Inc.®

Northbrook, Illinois • (708) 272-8800

Meville, New York • (516) 271-6200

Santa Clara, California • (408) 985-2400

Research Triangle Park,

North Carolina • (919) 549-1400

CERTIFICATE OF COMPLIANCE

CERTIFICATE NUMBER: 100893 - MHL7715

ISSUE DATE: 8 October 1993

Issued to: DABCO Chemical, Inc.
2215 Sutton Rd.
York, PA 17403

Report Reference: 16 August 1993

This is to Certify that
representative samples of: DAB-COAT No. 22, DAB-COAT No. 22L, and THM-R

Have been investigated by Underwriters Laboratories Inc. in accordance with the Standard(s)
indicated on this Certificate.

Standard(s) for Safety: ANSI/NSF Standard 60: Drinking Water Treatment Chemicals
Health Effects

Additional Information: Maximum Use Levels:

DAB-COAT No. 22 8 mg/l

DAB-COAT No. 22L 10 mg/l

THM-R 24 mg/l

Only those products bearing the UL Classification Marking should be considered as being covered by UL's Classification and Follow-Up Service.

The UL Classification Marking includes: the name "Underwriters Laboratories Inc."; the word "Classified"; a control number (may be alphanumeric) assigned by UL; a statement to indicate the extent of UL's evaluation of the product; and, the product category name (product identity) as indicated in the appropriate UL Directory.

LOOK FOR THE UL CLASSIFICATION MARKING ON THE PRODUCT

Engineer: *Jennie Longfield*
Underwriters Laboratories Inc.

Review Engineer: *Humphrey Sir*
Underwriters Laboratories Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

In Reply Refer To: 3HW12

President or General Manager
Dabco Chemicals
2215 Sutton Road
York, PA 17403

Re: Keystone Sanitation Landfill
Adams County, Pennsylvania
(See enclosed location map)

Dear Sir or Madam:

The U.S. Environmental Protection Agency (EPA) is currently investigating the source, extent and nature of the release or threatened release of hazardous substances into the environment on or about the Keystone Sanitation Landfill in Adams County, Pennsylvania. The Keystone Sanitation Landfill, located near the Pennsylvania - Maryland border, has operated as a private landfill since 1967. This investigation involves an inquiry into the generation, storage, treatment, transport and disposal of hazardous substances that have been or threaten to be released from the site.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), P.L. 99-499, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927, you or your company is requested to respond to the request for information set forth in this letter. Your response must furnish all information and documents in your possession, custody or control, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14). If documentation supporting your response to this information request is not available, please identify the individual making such determination and provide EPA with their telephone number.

AR200258

KIRKPATRICK & LOCKHART

THE PAYNE SHOEMAKER BUILDING
240 NORTH THIRD STREET
HARRISBURG, PENNSYLVANIA 17101-1503
TELEPHONE (717) 231-4500

BOSTON, MA
MIAMI, FL
PITTSBURGH, PA
WASHINGTON, D.C.

January 16, 1991

WRITER'S DIRECT DIAL NUMBER

PRPs Who Have Not Called

Re: Keystone Sanitation Landfill Superfund Site
Adams County, Pennsylvania

Gentlemen:

The purpose of this letter is to provide you with additional information regarding the activities of the Keystone Group Organization (the "Group").

As I discussed in my letter of January 3, 1991, your company has been identified by the Group as having potential liability for alleged contamination at the Keystone Sanitation Landfill Superfund Site (the "Site"). The Group is presently preparing a good faith proposal of settlement that must be submitted to the Environmental Protection Agency ("EPA") by February 7, 1991.

Your company has not responded to my earlier letter inviting you to join the Group in its attempt to settle this matter with EPA. By this letter, I hereby inform you that the next organizational meeting of the Group will take place on January 24, 1991, at 10:00 a.m. The meeting will be held at The Pennsylvania State University Downtown Center, 234 North Third Street, Harrisburg, Pennsylvania. The primary purpose of the meeting will be to discuss a preliminary allocation of responsibility among potentially responsible parties ("PRPs") associated with the Site.

As a prerequisite to joining the Group and attending the January 24th meeting, we require a commitment from your company. The cost to join is \$18,000: \$10,000 for past costs of the Group associated with hiring a consultant to comment on the remedial investigation/feasibility study ("RI/FS") performed by EPA and to prepare for consideration by EPA a no-cap alternative plan (current members have already paid this fee), plus \$8,000 to cover expenses that are anticipated over the next few weeks, including

¹ It is estimated that the no-cap alternative, which the Group recently presented to EPA for consideration, would be approximately one-third the cost of EPA's plan, which anticipates installation of a clay cap. EPA has yet to inform the Group whether it will accept the less costly (and more efficient) no-cap alternative.

ARDC009

KIRKPATRICK & LOCKHART

PRPs Who Have Not Called
January 16, 1991
Page 2

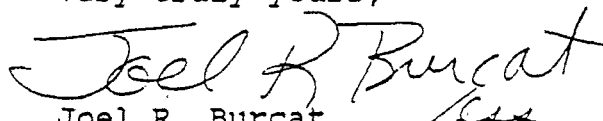
consultants' costs (current members have also been assessed this fee). Please make your check payable to the "Keystone Group Organization" and send it to:

Mr. William E. Heiser
Vice President of Finance
R. H. Sheppard Company, Inc.
101 Philadelphia Street
P. O. Box 459
Hanover, PA 17331-0459

The benefits to your company in joining the Group at this juncture are substantial. If you join now, you may (i) participate in negotiating a settlement with EPA, (ii) help to craft the allocation scheme that will be used by the Group, and (iii) avoid a subsequent lawsuit that most likely will be brought against non-settling parties by other PRPs. A premium will be charged for admission to the Group after February 7, 1991, for any parties allowed to join, at the Group's discretion.

The Group and I look forward to meeting with you on January 24th. If you have any questions, please do not hesitate to call me, Lauren S. Szejka, Esq. (717-231-4513), Lisa J. Sotto, Esq. (212-309-1223) or Lois Reznick, Esq. (215-994-2537).

Very truly yours,


Joel R. Burcat
Chairman, Steering Committee

cc: Keystone Group Organization
Lois Reznick, Esquire
Lisa J. Sotto, Esquire
Lauren S. Szejka, Esquire

ARDC010